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**ATTORNEYS FOR PLAINTIFFS**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

CHINA CENTRAL TELEVISION, a China company; CHINA INTERNATIONAL COMMUNICATIONS CO., LTD., a China company; TVB HOLDINGS (USA), INC., a California corporation; and DISH NETWORK L.L.C., a Colorado corporation, Plaintiffs.

CREATE NEW TECHNOLOGY (HK) LIMITED, a Hong Kong company; HUA YANG INTERNATIONAL TECHNOLOGY LIMITED, a Hong Kong company; SHENZHEN GREATVISION NETWORK TECHNOLOGY CO. LTD., a China company; CLUB TVPAD, INC., a California corporation; BENNETT WONG, an individual, ASHA MEDIA GROUP INC. d/b/a TVPAD.COM, a Florida corporation; AMIT BHALLA, an individual; NEWTVPAD LTD. COMPANY d/b/a NEWTVPAD.COM a/k/a TVPAD USA, a Texas corporation; LIANGZHONG ZHOU, an individual; HONGHUI CHEN d/b/a E-DIGITAL, an individual; JOHN DOE 1 d/b/a BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV; JOHN DOE 5 d/b/a GANG YUE; JOHN DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7 d/b/a GANG TAI WU XIA; and JOHN DOES 8-10,

Case No.  
CV 15-1869 SVW (AJWx)

**PLAINTIFFS' NOTICE  
REGARDING  
MODIFICATIONS NECESSARY  
TO MAY 31, 2016 ORDER  
GRANTING PLAINTIFFS'  
MOTION FOR DEFAULT  
JUDGMENT AND  
PERMANENT INJUNCTION  
AGAINST DEFENDANTS  
CREATE NEW TECHNOLOGY  
(HK) LIMITED AND HUA  
YANG INTERNATIONAL  
TECHNOLOGY LTD. [DKT.  
NO. 192]**

Judge: Hon. Stephen V. Wilson

{ Complaint Filed: March 13, 2015

1 Plaintiffs China Central Television, China International Communications Co.,  
 2 Ltd., TVB Holdings (USA), Inc., and DISH Network L.L.C. (collectively  
 3 “Plaintiffs”) hereby submit this notice to advise the Court of certain requested  
 4 modifications to the Court’s May 31, 2016 Order Granting Plaintiffs’ Motion for  
 5 Default Judgment and Permanent Injunction Against Defendants Create New  
 6 Technology (HK) Limited and Hua Yang International Technology Ltd. [Dkt. No.  
 7 192] (hereafter the “May 31 Order”). The May 31 Order contains the incorrect  
 8 amount of damages awarded to Plaintiffs and left blank the amount of the award of  
 9 attorneys’ fees to Plaintiffs, as detailed below:

- 10 • ***First***, in paragraph 7 on page 4 of the May 31 Order, the Court states  
 11 that “Defendants are ordered to pay damages to Plaintiffs in the amount  
 12 of **\$326,360,691.**” (Emphasis added). However, in Judge Morrow’s  
 13 December 7, 2015 Amended Order granting Plaintiffs’ motion for  
 14 default judgment against Defendants Create New Technology (HK)  
 15 Limited (“CNT”) and Hua Yang International Technology Ltd.  
 16 (“HYIT”) [Dkt. No. 158], the Court awarded Plaintiffs only **\$55,460,691**  
 17 in copyright and trademark damages. Plaintiffs respectfully request that  
 18 the amount of the damages awarded in paragraph 7 on page 4 of the  
 19 May 31 Order be modified such that Defendants are ordered to pay  
 20 damages to Plaintiffs in the amount of \$55,460,691, rather than  
 21 \$326,360,691.
- 22 • ***Second***, in paragraph 8 on page 4 of the May 31 Order, the Court left  
 23 blank the amount of the attorneys’ fees awarded to Defendants.  
 24 Plaintiffs have submitted all declarations and supporting evidence in  
 25 support of Plaintiffs’ request for attorneys’ fees in the amount of  
 26 **\$1,451,490** for the billed hours associated with CNY and HYIT’s  
 27 liability. On April 4, 2016, the Court, in its Order granting Plaintiffs’  
 28 request for a permanent injunction against CNT and HYIT, directed

1 Plaintiffs to file declarations in support of their request for attorneys' fees no later than April 15, 2016. Dkt. No. 185. Plaintiffs, on April 15, 2016, filed two declarations of Carla McCauley, and exhibits thereto, in support of their request for attorneys' fees, in accordance with the Court's directive. Dkt. No. 187. These declarations and exhibits had been previously submitted under Docket Nos. 159 and 164. *See id.* Accordingly, the Court has before it all of Plaintiffs' support for the attorneys' fees it is requesting against CNT and HYIT and Plaintiffs respectfully request that the Court enter an award of attorneys' fees for Plaintiffs in the amount of \$1,451,490.

11 For these reasons, Plaintiffs respectfully request that the Court issue an  
 12 Amended Order Granting Plaintiffs' Motion for Default Judgment and Permanent  
 13 Injunction Against Defendants Create New Technology (HK) Limited and Hua Yang  
 14 International Technology Ltd., correctly identifying the amount of damages awarded,  
 15 and setting forth an amount of attorneys' fees awarded to Plaintiffs.

16  
 17 DATED: June 6, 2016

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21 By: \_\_\_\_\_ /s/Sean M. Sullivan  
 22 Sean M. Sullivan

23 Attorneys for Plaintiffs